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**From:** Keller, Lynn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=08038B86D66A47D3AACA8BEE1A63A5A7-LKELLER]  
**Sent:** 1/26/2017 11:24:59 PM  
**To:** MacNicholl, Peter@DTSC [Peter.MacNicholl@dtsc.ca.gov]  
**Subject:** RE: Aerojet - GW Summit Day 2

Thanks for your thoughts; I agree. I know Aerojet is frustrated by the delay but I don't want to have to rescind comments because I didn't fully consider all the risks-esp given the anticipated future use at A40. Glad we are on the same page.

*Lynn M. Keller, EI, PMP*  
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415.947.4162

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**From:** MacNicholl, Peter@DTSC [mailto:Peter.MacNicholl@dtsc.ca.gov]  
**Sent:** Thursday, January 26, 2017 3:15 PM  
**To:** Keller, Lynn <Keller.Lynn@epa.gov>  
**Subject:** RE: Aerojet - GW Summit Day 2

Yes I do.

Obviously the vapor risk is so severe over the settling ponds that even a recreational user walking through the site ~250 days/year & 4 hrs per day has an excess health risk. With residential homes proposed only 200+ feet to the north of the ponds creates that potential for residents and their safety is directly related to the effectiveness of the vapor barrier (doesn't take into account those residents that are outdoors a lot gardening, recreating, and breathing ambient air).

We are learning so much more all the time the heterogeneity associated with these vapors – sampling data may falsely identify cold spots and “hot spots” that are a function of limited sample locations rather than actual chemical distribution and also not take into account the preferential pathways that the vapors may take that are not trivial even to technical staff. Outdated regulatory guidance documents recommend limited point sampling on the assumption that chemical distribution in the subsurface is relatively homogeneous. We now know that this is not the case, so the practice of collecting limited discrete samples is flawed.

-Pete

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**From:** Keller, Lynn [mailto:Keller.Lynn@epa.gov]  
**Sent:** Thursday, January 26, 2017 2:05 PM  
**To:** MacNicholl, Peter@DTSC  
**Subject:** RE: Aerojet - GW Summit Day 2

Ok thanks, Pete. Do you have concerns about VI potential in ambient air from the source areas, and VI potential in future homes built to the north of A40? I need to see how the VI investigation shakes out in order to reevaluate this myself; and of course include my VI experts and toxicologist.

Chris is even ok with EPA issuing a letter telling AR not to place homes so close to A40 source areas—which would require the developers to move the anticipated land use around to accommodate. I can't make that determination either though until I have more information to justify it.

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**From:** MacNicholl, Peter@DTSC [mailto:Peter.MacNicholl@dtsc.ca.gov]  
**Sent:** Thursday, January 26, 2017 11:28 AM  
**To:** Keller, Lynn <Keller.Lynn@epa.gov>  
**Subject:** RE: Aerojet - GW Summit Day 2

Ok Ill attend. I just forwarded AR RTCs on the Area 40 FS to our support staff to evaluate. I will be looking at AR RTCs to my specific comments as well. Thanks for the update and Ill talk to you soon.

-Pete

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**From:** Keller, Lynn [mailto:Keller.Lynn@epa.gov]  
**Sent:** Thursday, January 26, 2017 10:29 AM  
**To:** MacNicholl, Peter@DTSC  
**Subject:** RE: Aerojet - GW Summit Day 2

Hi, Pete. I think it is for at least the OU7 Fate & Transport modeling portion of it.

I'm still holding EPA comments on the Draft FS for Area 40 until the VI investigation gives us enough info to move forward as planned or make some changes, as instructed by my VI expert and toxicologist.

Things should slow down some in spring with VI work; can we (DTSC, EPA, WB) plan a meeting in early spring with DTSC's CEQA people to figure out how to most efficiently move forward with Area 40 environmental planning and community involvement requirements, since we have a mix of DTSC and EPA CERCLA studies and documents going on this?

Thanks, Pete,  
Lynn

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**From:** MacNicholl, Peter@DTSC [mailto:Peter.MacNicholl@dtsc.ca.gov]  
**Sent:** Thursday, January 26, 2017 10:22 AM  
**To:** Keller, Lynn <Keller.Lynn@epa.gov>; Varljen, Mark <Mark.Varljen@Rocket.com>; Praskins, Wayne <Praskins.Wayne@epa.gov>; ROJAS-MICKELSON, DAEWON <rojas-mickelson.daewon@epa.gov>; MacDonald, Alex@Waterboards <Alex.MacDonald@waterboards.ca.gov>; Rohrer, Jim@DTSC <Jim.Rohrer@dtsc.ca.gov>; Santiago-Ocasio, Carmen <Santiago-Ocasio.Carmen@epa.gov>; Tom.Lae@CH2M.com  
**Cc:** Phillips, Peter (PPhillips@GilbaneCo.com) <PPhillips@GilbaneCo.com>; william.h.schneider@gmail.com  
**Subject:** RE: Aerojet - GW Summit Day 2

Yes I can attend if you think my participation is needed.

-Pete

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**From:** Keller, Lynn [mailto:Keller.Lynn@epa.gov]  
**Sent:** Thursday, January 26, 2017 10:14 AM  
**To:** Varljen, Mark; Praskins, Wayne; ROJAS-MICKELSON, DAEWON; MacDonald, Alex@Waterboards; Rohrer, Jim@DTSC;

Santiago-Ocasio, Carmen; [Tom.Lae@CH2M.com](mailto:Tom.Lae@CH2M.com); MacNicholl, Peter@DTSC  
**Cc:** Phillips, Peter ([PPhillips@GilbaneCo.com](mailto:PPhillips@GilbaneCo.com)); [william.h.schneider@gmail.com](mailto:william.h.schneider@gmail.com)  
**Subject:** RE: Aerojet - GW Summit Day 2

Hi, Mark.

I'll hold 14-16 March for these meetings; works for me.

Tom Lae confirmed 15 March for a F&T meeting works for him, but he's waiting on a confirmation from his modeling expert, Pete Lawson. He'll let us know when he hears back.

I added Pete MacNicholl since he should also attend the F&T discussions 3/15. Does that work for you, Pete?

Thank you,  
Lynn

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**From:** Varljen, Mark [<mailto:Mark.Varljen@Rocket.com>]

**Sent:** Wednesday, January 25, 2017 2:03 PM

**To:** Keller, Lynn <[Keller.Lynn@epa.gov](mailto:Keller.Lynn@epa.gov)>; Praskins, Wayne <[Praskins.Wayne@epa.gov](mailto:Praskins.Wayne@epa.gov)>; ROJAS-MICKELSON, DAEWON <[rojas-mickelson.daewon@epa.gov](mailto:rojas-mickelson.daewon@epa.gov)>; MacDonald, Alex@Waterboards <[Alex.MacDonald@waterboards.ca.gov](mailto:Alex.MacDonald@waterboards.ca.gov)>; 'jrohrer@dtsc.ca.gov' <[jrohrer@dtsc.ca.gov](mailto:jrohrer@dtsc.ca.gov)>; Santiago-Ocasio, Carmen <[Santiago-Ocasio.Carmen@epa.gov](mailto:Santiago-Ocasio.Carmen@epa.gov)>

**Cc:** Phillips, Peter ([PPhillips@GilbaneCo.com](mailto:PPhillips@GilbaneCo.com)) <[PPhillips@GilbaneCo.com](mailto:PPhillips@GilbaneCo.com)>; [william.h.schneider@gmail.com](mailto:william.h.schneider@gmail.com)

**Subject:** Aerojet - GW Summit Day 2

First, thanks everyone for your patience listening to me spend 6 hrs describing Aerojet Groundwater Info. I hope it was helpful.

As Lynn mentioned at the meeting, given all of our busy schedules, it would be a good idea to get the follow-up session scheduled as soon as possible. Does anyone have any preferences for dates right now?

I believe we have a bi-monthly meeting (which will include OU-7 Fate and Transport model development presentation) and the CAG meeting scheduled for March 15. If it is convenient to schedule the follow-up OU3/OU-5 Groundwater meeting for either the 14<sup>th</sup> or 16<sup>th</sup>, that would work with us. I'm totally open to other days as well. Based on how quickly Monday's meeting went and how I felt like we just started touching some of the subjects, I believe a full day is necessary (in addition to the meeting on the 15<sup>th</sup>).

Please let me know your thoughts. Thanks again for everyone's participation Monday.

**Mark D. Varljen**

Manager, Environmental Remediation



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